

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

JULIA HUBBARD and KAYLA  
GOEDINGHAUS,

Plaintiffs,

v.

TRAMMELL S. CROW, JR., et al.  
Defendants.

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Case No. 5:23-cv-00580-FB

Judge: Hon. Fred Biery

Date Action Filed: May 8, 2023 (transferred)

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**SUPPLEMENTAL DECLARATION OF GERALD E. HAWXHURST IN SUPPORT OF  
TRAMMELL S. CROW'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS  
AND FOR AN AWARD OF THE EXPENSES INCURRED IN BRINGING THIS MOTION**

I, Gerald E. Hawxhurst, declare as follows:

1. I am the managing partner at the law firm of Hawxhurst LLP, co-counsel of record for defendant Trammell S. Crow. I make this declaration in support of Mr. Crow's motion to compel production of documents. I have personal knowledge of the facts stated herein, and if called upon to do so, I could and would testify truthfully and competently with respect thereto.

2. I am familiar with Hawxhurst LLP's billing practices, the rates charged Mr. Crow for this matter, and the time spent by me and my colleague Kyle Foltyn-Smith in preparing Mr. Crow's reply in support of the motion to compel production of documents and related papers.

3. For this matter, my hourly rate is \$850 per hour and Mr. Foltyn-Smith's is \$650. I spent 0.4 hours reviewing and editing this reply and preparing my declaration; Mr. Foltyn-Smith spent 2.0 hours researching and preparing the reply papers.

4. In total, Mr. Crow incurred \$1,640 in attorneys' fees for the preparation and filing of this motion. These amounts do not include the hours of attorney time spent sending emails

and conferring with plaintiffs to obtain their compliance with the discovery rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in Jonestown, County of Travis, on the 4th day of April 2024.



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Gerald E. Hawxhurst